# APPENDIX I SITE HEALTH AND SAFETY PLAN RI/FS WORK PLAN

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#### I.1.0 GENERAL

The RI/FS investigation program to be implemented to satisfy the requirement as presented in the SOW will involve drilling and sampling within the limits of the Four County Landfill Site (Site). During these operations, personnel may come in contact with sediments, groundwater and surface water which potentially contain hazardous materials. To ensure that any direct contact with potentially contaminated material by Site personnel is minimized, a Site-specific Health and Safety Plan (HSP) has been developed, as presented herein. This HSP has been developed to ensure the following:

- i) that Site personnel are not adversely exposed to the compounds of concern;
- ii) that public welfare or the environment are not adversely impacted by off-Site migration of contaminated materials due to work activities at the Site; and
- iii) compliance with applicable governmental and non-governmental (American Conference of Governmental Industrial Hygienist) regulations and guidelines. In particular, the amended rules of the Occupational Safety and Health Act for Subpart H of Part 1910 (Title 29 Code of Federal Regulations (CFR) Part 1910.120) will be implemented for all Site work.

For the purpose of this HSP, all sampling and investigative activities carried out on Site involving contact with potentially contaminated materials will be considered contaminated operations requiring personal protective equipment (PPE). Similar activities occurring off Site are considered non-contaminated operations requiring a modified level of PPE from that for on-Site work. A detailed description of the PPE required is presented in Section I.8.0.

All sampling and investigative operations at the Site will be conducted in accordance with the provisions of the HSP. Cost and/or

scheduling considerations will not be considered as justification for modifying this plan.

## I.2.0 <u>SITE CHARACTERIZATION AND HAZARD ANALYSIS</u>

The Site was used as a sanitary landfill from 1972 to 1977, where unlined waste deposits were covered with backfill. From 1978 to 1984 the Site accepted "separate area waste" including paint sludge, municipal wastewater treatment sludge, asbestos and liquids which were deposited in unlined cells. From 1980 to 1989 the Site accepted RCRA hazardous wastes which were deposited in synthetically-lined disposal cells (A, B and C). Based on various historical investigations, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOC) and inorganic compounds have been detected in the sampled media that is associated with the Site.

Potential hazards associated with activities to be conducted at the Site include:

- i) drilling operations;
- ii) material and equipment handling injuries;
- iii) contact with contaminated sediments, water and leachate;
- iv) chemical inhalation; and
- v) biological hazards (poison ivy, snakes, stinging/biting insets, etc.).

Risks associated with these activities will be minimized by implementing engineering controls and the proper use of personal protective equipment (PPE). Table I.1 summarizes potential hazards associated with the Site.

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## TABLE I.1

# SITE HAZARD ANALYSIS FOUR COUNTY LANDFILL SITE FULTON COUNTY, INDIANA

Site Activities	Hazards	Prevention
Groundwater Sampling	Chemical hazards due to inhalation and dermal contact	Proper use of PPE
	Exposure to temperature extremes	Monitor for heat or cold stress
	Physical hazards including steep grades and unstable surfaces	Use "buddy system" during Site activities
	Biological Hazards	Proper PPE, exercising ordinary caution, use of "buddy system" during Site activities
Well Abandonment	Chemical hazards due to inhalation and dermal contact	Proper use of PPE
	Working around drilling equipment	Maintain a safe distance from drill rig when it is in use
	Exposure to temperature extremes	Monitor for heat or cold stress
	Sharp objects	Wear cut resistant work gloves
	Slip, trip, fall	Clear walkways and work area of obstructions
	High noise levels	Use hearing protection
	Physical hazards including steep grades and unstable surfaces	Use "buddy system" during Site activities

## **TABLE I.1**

# SITE HAZARD ANALYSIS FOUR COUNTY LANDFILL SITE FULTON COUNTY, INDIANA

Site Activities	Hazards	Prevention
Well Abandonment (continued)	Biological Hazards	Proper PPE, exercising ordinary caution, use of "buddy system" during Site activities
Sediment and Surface Water Sampling	Chemical hazards due to inhalation and dermal contact	Proper use of PPE
	Exposure to temperature extremes	Monitor for heat or cold stress
	Physical hazards including steep grades and unstable surfaces	Use "buddy system" during Site activities
	Biological Hazards	Proper PPE, exercising ordinary caution, use of "buddy system" during Site activities
Site Maintenance Activities	Chemical hazards due to inhalation and dermal contact	Proper use of PPE
	Exposure to temperature extremes	Monitor for heat or cold stress
	Physical hazards including steep grades and unstable surfaces	Use "buddy system" during Site activities
	Biological Hazards	Proper PPE, exercising ordinary caution, use of "buddy system" during Site activities

#### I.3.0 BASIS

The Occupational Safety and Health Administration (OSHA) Standards and Regulations contained in Title 29, CFR, Parts 1910 and 1926 (29 CFR 1910 and 1926) including the amended sections in 29 CFR 1910.120 and current Threshold Limit Values (TLVs) as provided by the American Conference of Governmental Industrial Hygienists (ACGIH) provide the basis for this Health and Safety Plan. Some of the specifications within this section are in addition to OSHA regulations and reflect the positions of the USEPA, the National Institute for Occupational Safety and Health (NIOSH) and the United States Coast Guard (USCG) regarding procedures required to ensure safe operations at potential hazardous waste sites.

The safety and health of the public and on-Site personnel and the protection of the environment will take precedence over cost and schedule considerations for all project work. The Site maintenance contractor will designate an on-Site individual as Site Health and Safety Officer (HSO) to implement the HSP during Site maintenance activities. CRA will designate an HSO to implement the HSP during field sampling activities. The HSOs will be responsible for decisions regarding when work will be stopped or started for health or safety considerations.

## I.4.0 RESPONSIBILITIES AND ADMINISTRATION

The HSO will supervise the implementation of the Health and Safety Plan and will be responsible for all decisions regarding operations and work stoppages due to health and safety considerations.

The responsibilities of the HSO are as follows:

- be responsible for implementation of the HSP at the initiation of Site work;
- ii) conduct the initial briefing sessions for all on-Site personnel with regard to the HSP and other safety requirements to be observed during field sampling, including:
  - a) potential hazards,
  - b) personal hygiene principles,
  - c) personal protective equipment,
  - d) respiratory protection equipment usage, and
  - e) emergency procedures dealing with fire and medical situations;
- iii) review and modify the HSP as more information becomes available concerning the hazardous materials involved, and review all monitoring reports;
- iv) supervision and enforcement of safety equipment usage;
- v) supervision and inspection of equipment cleaning;
- vi) personnel training in safety equipment usage and emergency procedures;
- vii) monitoring of the health and safety program under direction of an industrial hygienist;
- viii) suspend work activity if unsafe working conditions develop;

- ix) inform workers of the nature of chemical exposure risk as required by the "Right-to-Know" Law;
- x) recommend medical examination when worker appears to require it;
- xi) coordination of emergency procedures;
- xii) assure that safety equipment is provided, maintained and accessible to Site personnel; and
- xiii) maintain a log with a sign in/out sheet for personnel performing activities and visitors entering the Site.

## I.5.0 MEDICAL SURVEILLANCE

In accordance with requirements detailed in 29 CFR 1910.120 and 29 CFR 1910.134, all Site personnel who will come in contact with potentially contaminated materials will have received, within one year prior to starting field activities, medical surveillance by a licensed physician or physician's group.

Medical records for all on-Site sampling personnel will be maintained by their respective employers. The medical records will detail the tests that were taken and will include a copy of the consulting physician's statement regarding the tests and the employee's suitability for work.

The medical records will be available to the employee or his designated representative upon written request, as outlined in 29 CFR 1910.120, Section (f).

Each employer will ensure that its personnel involved in on-Site work will have all necessary medical examinations prior to commencing work which requires respiratory protection or exposure to hazardous materials. Personnel not obtaining medical certification will not perform work within contaminated areas.

Interim medical surveillance will be completed if an individual exhibits poor health or high stress responses due to on-Site activity or if an accidental exposure to elevated concentrations of contaminants occurs.

#### I.6.0 TRAINING

CRA will require that all personnel actively engaged in RI/FS and/or Site O&M activities, prior to entering the Site, complete training sessions in accordance with 29 CFR 1910.120. This training shall consist of a minimum of 40 hours of instruction off Site and three days of actual field inspection under direct supervision. Each employer will maintain documentation stating that its on-Site personnel have complied with this regulation.

Prior to commencing Site activities, a Site-specific initiation session will be conducted. This session will be used to instruct the on-Site personnel as to what the potential Site hazards are. Topics covered will include:

- i) Site-specific health and safety hazards;
- ii) level of PPE required;
- iii) safe use of equipment;
- iv) decontamination procedures; and
- v) emergency response procedures.

All personnel who attend this session will sign a Training Acknowledgment Form, an example of which is presented as Attachment I.

#### I.7.0 WORK AREAS

The HSO will delineate work areas in the field and will limit equipment, operations and personnel in each of the areas as defined below:

i) Exclusion Zone - This zone will include the area within the immediate vicinity of active sampling locations and the landfill. The Exclusion Zone will be delineated in the field at active sampling locations prior to commencing work at each sampling location.

Access to the Exclusion Zone will be restricted to personnel who are wearing the proper PPE, have received the required medical examination, and have undergone the required training. Eating, drinking, or smoking is prohibited in this area.

- ii) Contamination Reduction Zone this will be established adjacent to the exclusion zone. Procedures will be implemented to prevent active or passive contamination from the exclusion zone.
- iii) Support Zone This is the area in the vicinity of the Site maintenance building.

#### I.8.0 PERSONAL PROTECTIVE EQUIPMENT

All on-Site personnel are required to be equipped with PPE appropriate for the nature of work being completed. All safety equipment and protective clothing will be inspected regularly to ensure the integrity of the equipment and will be kept clean and well-maintained.

Safety equipment and apparel as required on Site will be Level D or Level C protective equipment within the Exclusion Zone.

The Level D protective equipment consists of the following:

- i) work boots with steel toe and shank;
- ii) hard hat;
- iii) latex and/or cotton gloves; and
- iv) safety glasses and/or goggles.

Level C protective equipment may be used on Site if the action levels in Section I.9.0 are exceeded, Level C CPPE consists of the following:

- i) individually assigned full-facepiece air-purifying respirators (NIOSH approved), with appropriate cartridges for organic vapors and particulates. Respirators should be available at all times and donned when required as indicated by air monitoring;
- ii) chemical-resistant disposable coveralls;
- iii) latex and/or cotton inner gloves;
- iv) nitrile outer gloves;
- v) work boots with steel toe and shank;
- vi) chemical-resistant overboots or booties;

- vii) hard hat; and
- viii) safety glasses and/or chemical-resistant goggles.

If work is conducted beyond the Site boundary, it is anticipated that Level D PPE will be required.

Additional protective equipment usage guidelines to be implemented include:

- i) prescription eyeglasses in use on the Site will be safety glasses;
- ii) contact lenses will not be permitted;
- iii) all disposable or reusable nitrile, latex and/or cotton gloves worn on the Site will be changed, decontaminated or discarded at the end of each day;
- iv) during periods of respirator usage, respirator cartridges and filters will be changed daily, or upon breakthrough, whichever occurs first;
- on-Site personnel who have not passed a respirator fit test will
  not be permitted to enter or work in the Exclusion Zone.
   Personnel will not be permitted to have beards, or long
  sideburns or mustaches as these interfere with a proper fit of the
  respirator;
- vi) all PPE worn on Site will be decontaminated or discarded at the end of each work day;
- vii) duct tape will be used to ensure that disposable coveralls and gloves are tightly secured when personnel are working within the Exclusion Zone; and

vii) no watches, rings or other accessories will be permitted during drilling and sampling activities.

#### I.9.0 RESPIRATOR PROGRAM

Prior to arriving at the Site, all on-Site personnel will have received training in the use of, and have been fit tested for a full-facepiece respirator. Companies employing individuals required to perform intrusive work at the Site shall have a written respiratory program complaint with 29 CFR 1910.134.

A photoionization detector will be used to determine if organic vapors and some inorganic gases are present. A background reading will be established prior to commencing work activities at each monitoring well or sampling location.

Action levels to determine the level of respiratory protection necessary during field activities will be:

Sustained Photoionization Organic Vapor Reading Above Background

Protection Level

1 - 25 ppm

full-facepiece air purifying respirator (Level C)

>25 ppm

shut down activities

A combustible gas indicator will be used to monitor for oxygen/combustible gases/carbon monoxide/hydrogen sulfide and a monotox unit will be used to monitor for hydrogen cyanide.

Work will be stopped and the work area will be allowed to vent if monitoring indicates that any of the following conditions exist:

i) toxic gases are present at concentrations which present
Immediate Danger to Life and Health (IDLH) conditions, or in
excess of the protection factor afforded by the air purifying
respirator (whichever is lower); or

- ii) the oxygen content of the air is less than 19.5 percent;
- iii) hydrogen sulfide levels exceed 2 ppm;
- iv) carbon monoxide levels exceed 20 ppm;
- v) hydrogen cyanide levels exceed 2 ppm; or
- vi) organic vapor concentrations in the breathing zone exceeds 25 ppm.

Air monitoring should continue, at a safe distance, if operations are stopped due to action level exceedences, to determine if a threat to the surrounding community exists.

## I.10.0 <u>JUSTIFICATION</u>

These action levels assume that all NIOSH criteria for using an air purifying respirator (APR) have been met. An APR can typically be worn in concentrations of up to 50 times the TLV for a given contaminant. Most of the contaminants at the Site have TLVs or PELs higher than 1 ppm. Because of differences in sensitivities with direct reading instruments, a 50 percent safety factor is included when determining action levels. Therefore, the calculation would be:

1 ppm (TLV) x 50 (protection factor) x 0.5 (50% safety factor) = 25 ppm

A non-specific total gas and vapor analyzer such as a photoionization detector, will be used to provide a relative index for cumulative effects of multiple similar compounds.

The primary routes for exposure to contaminants for individuals performing RI/FS investigative tasks include direct contact, ingestion and inhalation. The risk of exposure due to direct contact and ingestion will be minimized through the proper use of PPE as described in Section I.8.0 and by exercising ordinary care during sampling activities. In order to minimize exposure by the inhalation pathway, the respirator and air monitoring programs discussed in Sections I.9.0 and I.12.0 will be undertaken.

Table I.2 presents a summary of the contaminants of concern for the inhalation pathway and the associated TLVs and PELs for these compounds. The contaminants of concern list was developed using a worst-case scenario on the basis of data developed during previous sampling rounds at the Site. Concentrations of VOCs were compared against the TLVs and PELs. It was assumed that the entire concentration of VOCs would volatilize into the air and would be present at their maximum concentration (in parts per million) observed in groundwater, within the breathing zone of the work area. VOCs with concentrations in groundwater exceeding the TLVs or PELs were therefore, selected as contaminants of concern. Also selected as contaminants of concern were common landfill gases such as hydrogen sulfide, carbon monoxide, carbon dioxide, methane and hydrogen cyanide.

**TABLE I.2** 

# CONTAMINANTS OF CONCERN FOUR COUNTY LANDFILL SITE FULTON COUNTY, INDIANA

Compound	ACGIH TLV (ppm)	OSHA PEL (ppm)
Acetone	750	<b>7</b> 50
Benzene	1	1
Carbon dioxide	5,000	10,000
Carbon monoxide	25	35
Carbon tetrachloride	5	2
Chlorobenzene	10	<i>7</i> 5
Chloroform	10	2
1,1,2,2 Tetrachloroethene	1	1
Hydrogen cyanide	10	4.7
Hydrogen sulfide	10	10
Methane		
Methyl isobutyl ketone	50	50
Methylene chloride	50	500
Tetrachlorethene	25	25
1,2-Dichloroethane	10	1
Tetrahydrofuran	200	200
Toluene	50	100

Chemical specific information is presented as Attachment II of this HSP.

#### I.11.0 PERSONAL HYGIENE

All personnel performing or supervising work within the Exclusion Zone are required to observe and adhere to the personal hygiene-related provisions of this section.

On-Site personnel found to be disregarding the personal hygiene-related provisions of this HSP will, at the discretion of the HSO, be barred from the Site.

The following equipment/facilities will be made available for the personal hygiene of all on-Site personnel:

- i) suitable disposable outerwear, gloves, respiratory protection and footwear on a daily basis for the use of on-Site personnel;
- ii) disposal containers for used disposable outerwear; and
- iii) potable water and a suitable sanitation facility.

The HSO will enforce the following regulations for personnel actively participating in the field sampling program and Site maintenance activities:

- i) on-Site personnel will wear appropriate PPE when in the Exclusion Zone;
- ii) used disposable outerwear will not be reused if deemed to be unsuitable to provide the necessary protection, and when removed, will be placed inside disposal containers provided for that purpose;
- iii) smoking, eating and drinking will be prohibited within the Exclusion Zone. These activities will be permitted only within the area of the Support Zone; and

iv) on-Site personnel will thoroughly cleanse their hands, face, neck area and other exposed areas before smoking, eating or drinking and before leaving the Site.

#### I.12.0 <u>AIR MONITORING</u>

During the progress of investigative work, air quality on Site will be monitored. Monitoring will be conducted on a daily basis and additionally as required by special or work-related conditions. Air monitoring will be completed within the breathing zone at each active work site.

The daily monitoring program will consist of monitoring with a photoionization device for organic vapors; combustible gas indicator hydrogen sulfide, and carbon monoxide indicator; and hydrogen cyanide using a monotox unit. Each piece of equipment used for air monitoring will be identified. Operation and calibration procedures will be maintained on file at the Site. Calibration and maintenance records will be kept in the field log.

Identification of volatile organic vapor levels in excess of the action levels cited in Section I.9.0 shall be reported to the HSO, who will determine when PPE should be upgraded and operations be shut down and restarted.

If work is stopped because action levels have been exceeded, air monitoring will continue from a safe distance to determine if there is a threat to the surrounding community.

## I.13.0 <u>COMMUNICATIONS</u>

Emergency numbers including police, fire, ambulance, hospital and appropriate Regulatory agencies (Table I.3) will be prominently posted near the Site telephone(s).

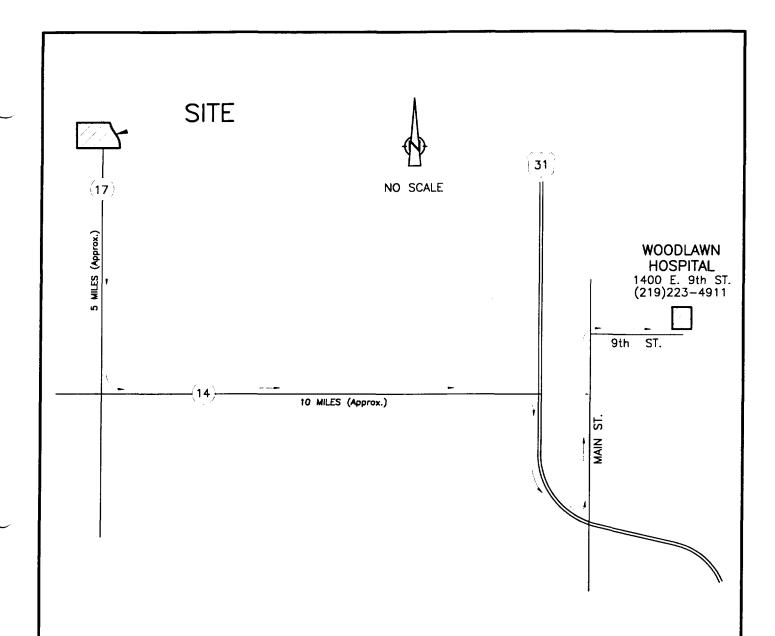
A route map to the nearest emergency medical facility (Figure I.1) will be posted in each vehicle. Prior to initiating Site activities, the emergency medical facility will be notified of Site activities to ensure preparedness to respond to any Site-related injuries.

To ensure familiarity with the hospital route, at least one site representative must drive the route to the hospital, prior to site activities.

## TABLE I.3

# EMERGENCY CONTACTS FOUR COUNTY LANDFILL FULTON COUNTY, INDIANA

	Emergency	Business
Agency/Firm	Telephone Number	Telephone Number
Leiters Ford Fire Department	(219) 542-4491	
Fulton County Sheriff	(219) 223-2819	
Ambulance	(219) 223-4911	
Woodlawn Hospital	(219) 223-4911	(219) 223-3141
Poison Control Center	(800) 942-5969	
National Response Center	(800) 424-8802	
CRA Industrial Hygiene		
-Chicago (Matt Lazaric)	***	(708) 299-9933
-Corporate (Mitch Bergner)		(612) 639-0913
CRA Project Manager (Bruce Clegg)		(708) 299-9933
IDEM Emergency reponse		
24-Hour Spill Reporting Hotline	(317)233-7745	



#### DIRECTIONS TO THE HOSPITAL

TAKE 17 SOUTH TO 14
TURN LEFT ON 14 AND PROCEED SOUTH
ONTO US ROUTE 31
EXIT ROUTE 31 AT MAIN ST. AND PROCEED NORTH
GO NORTH ON MAIN ST. TO 9TH ST.
TURN RIGHT (EAST) ON 9TH ST.
THE HOSPITAL IS LOCATED ON 9TH ST.
ON THE LEFT SIDE OF THE ROAD.

figure I.1

ROUTE TO HOSPITAL
FOUR COUNTY LANDFILL SITE
Fulton County, Indiana

CRA

## I.14.0 EMERGENCY AND FIRST AID EQUIPMENT

Safety equipment will be available for use by Site personnel and will be located and maintained on Site. The safety equipment will include, but is not limited to, the following:

- i) portable emergency eye wash;
- ii) two ABC type dry chemical fire extinguishers; and
- iii) approved first-aid kit for a minimum of ten personnel.

#### I.15.0 <u>EMERGENCY RESPONSE PLAN</u>

It is essential that Site personnel be prepared in the event of an emergency.

CRA will designate an individual as the Health and Safety Officer (HSO), who will be responsible for implementing the emergency response plan. The HSO will be thoroughly familiar with all aspects of the Site including facility layout, all operations and activities on Site, and the location and characteristics of waste handled.

## On-Site Emergency Response

The HSO will ensure that an employee alarm system is in place prior to conducting activities at the Site. The alarm system shall consist of an air horn and/or visual signals such as hand/arm gestures. The HSO shall establish evaluation routes and review the potential for emergencies.

Prior to commencing Site activities the HSO will discuss Site activities with the appropriate authorities including the Sheriff, Fire Department and Hospital. These meetings will serve to identify the HSO through whom all information and coordination will occur in the event of a serious incident.

In the event of injury to on-Site personnel, the following protocol will be followed:

- i) notify the Health and Safety Officer;
- ii) contact the designated hospital;
- iii) decontaminate personnel if possible, and administer appropriate first aid. If personnel cannot be decontaminated, alert hospital to possible problems of contamination; and

iv) transport personnel to the medical facility along a predefined route.

In the event of an emergency on Site, the following protocol will be followed:

- i) notify the Health and Safety Officer;
- ii) evacuate the work area;
- iii) the HSO will perform a head-count to ensure that all personnel have exited the area;
- iv) the HSO will notify the appropriate emergency response personnel; and
- v) provide the HSO and emergency response personnel with useful information.

The HSO shall assess the need for assistance from outside emergency response entities and shall contact those entities as required.

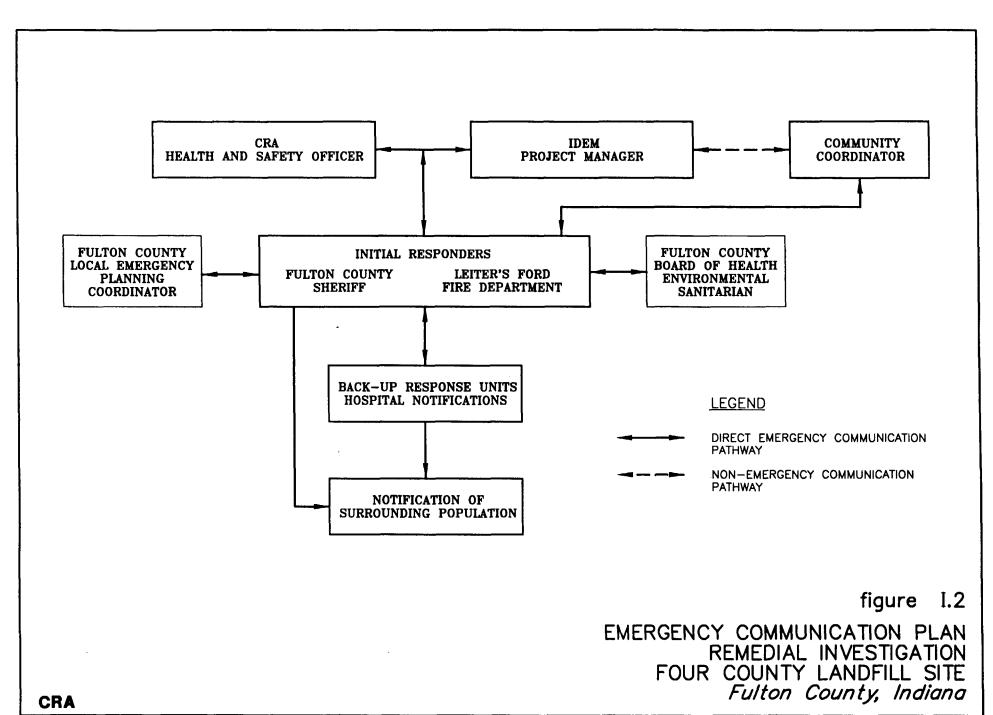
## Community Notification Plan

On-Site activities to be conducted as part of the RI investigation presented in this work plan are generally non-intrusive in nature and are considered to be of limited risk to the population surrounding the Site. Intrusive activities will be conducted on Site only during monitoring well abandonment activities and the landfill gas survey. Furthermore, monitoring wells and piezometers which are to be abandoned generally lie outside the purported waste depositional boundaries. Nevertheless, a community notification plan is presented herein in the event a major fire, explosion and/or chemical release occurs which threatens the population surrounding the Site. This emergency notification plan has been prepared with the input of emergency planning and response agencies located in Fulton County including the local civil defense director, the local

fire department and the Fulton County Sheriff's Department. The community notification plan summarized herein, is compatible with the Fulton County emergency response plan and utilizes the communication and response structure which reportedly has been carefully planned and implemented by Fulton County emergency response planning officials to address emergency situations which may arise within the County. The existing response structure involves reciprocal agreements between response authorities within Fulton County and between Fulton County and outside response entities (located in surrounding counties) in order to provide the appropriate response equipment and properly trained personnel in the event of a major emergency within the County.

During field activities, communication between CRA and the Indiana Department of Environmental Management's (IDEM's) assigned project manager will occur on an as-needed basis. This communication will apprise IDEM of activities planned at the Site, schedule for implementation and whether these activities are intrusive in nature. IDEM or IDEM's designated contractor may be on-Site during field activities. Although IDEM will discuss the progress of Site activities with local representatives through IDEM's normal community relations activities, IDEM's project manager may decide to discuss in detail with a designated community representative, the activities planned, the schedule for implementation and the procedures to be utilized during the work. This type of communication will be a normal part of day-to-day project coordination and management.

Figure I.2 depicts the flow of communication and response in the event of an emergency at the Site which may threaten the surrounding community. In the event the HSO determines that an incident requires the assistance of emergency response agencies, the HSO shall, after stopping work activities and appropriately evacuating the work areas, first contact the Fulton County Sheriff's Department and immediately thereafter, contact the Leiter's Ford Fire Department. The HSO will provide a detailed account of the incident to the Sheriff and Fire Departments, advise as to whether there are any serious injuries which require immediate medical attention, and discuss the perceived need for evacuation of the surrounding community. Upon arrival to the Site, the Leiter's Ford Fire Department and



the Fulton County Sheriff's Department will assess the situation with the assistance of the HSO. If necessary, the HSO will contact the National Response Center and IDEMs emergency response spill reporting hotline.

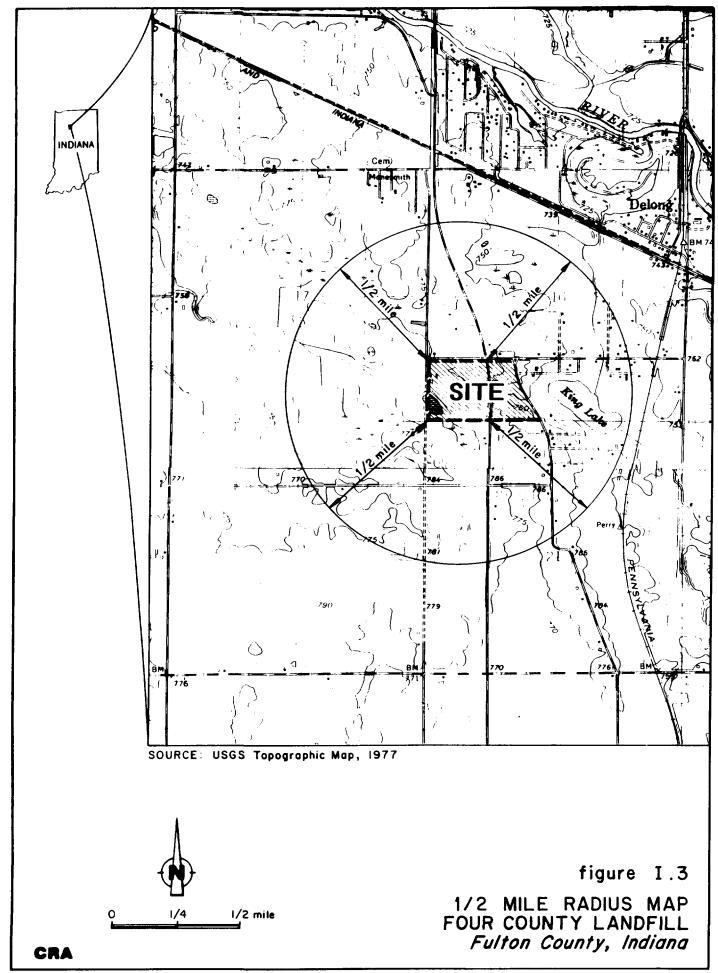
The Leiter's Ford Fire Department and the Fulton County Sheriff's Departments shall assess their capability to respond to the emergency at the Site. In the event that an initial assessment indicates that the situation is beyond the response capabilities of the Leiter's Ford Fire Department, the Leiter's Ford Fire Department will call for the appropriate back up from fire departments in the area. The Sheriff's Department is responsible for assessing their capability to respond to an emergency in a timely manner on the basis of manpower availability and proximity of units to the Site. Should back-up police units from the surrounding area be required, the Sheriff's Department will coordinate such assistance.

Upon determining that a major emergency exists at the Site, the Fulton County Sheriff's Department shall notify the Fulton County Local Emergency Planning Coordinator (LEPC) and the Fulton County Board of Health Environmental Sanitarian. The decision to evacuate the population surrounding the Site will be a joint decision between the incident commander, the LEPC, the Fulton County Environmental Sanitarian and responding agencies at the Site. The Fulton County Sheriff has the responsibility to coordinate his police units and police units assisting the Sheriff's Department, to evacuate the surrounding population as quickly, as orderly, and as safely as possible. Individual police units will evacuate the area by siren and loudspeaker. Emergency response officials at the Site will also assess the need for ambulance service, the magnitude of this need, and coordinate with appropriate hospitals to service any injured parties. A flag or wind sock will be placed on the maintenance building prior to commencing intrusive activities, to assist authorities in identifying wind direction during an emergency.

The population surrounding the Site may wish to designate a community coordinator. Should the surrounding population decide to name a community coordinator, the name of the community coordinator will be provided to IDEM. IDEM shall provide the name of this

individual to CRA. The community coordinator will be apprised by IDEM of activities which will be conducted at the Site and the schedule for implementation. The community coordinator will be responsible for disseminating information from IDEM to interested parties in the surrounding community. The community coordinator may also assist CRA and the emergency response authorities by providing a list of special needs people, located within a 1/2-mile radius of the Site (Figure I.3), that may require special assistance in the event an evacuation of the Site is ordered by the appropriate authorities. The community coordinator will provide this list to CRA and the emergency response authorities. A copy of this list will be kept at the Site by the HSO in the event of an emergency. The community coordinator may also provide additional information as requested by emergency response authorities in order to enhance the efficiency of the response.

In order to discuss the upcoming activities proposed at the Site, fully apprise the local planning officials regarding these activities, and receive input regarding emergency response procedures, a designated representative of CRA will attend a local emergency response community meeting prior to initiation of Site activities. Attendance at this meeting will be documented in the appropriate monthly report and in correspondence with IDEM's designated project manager.



## I.16.0 EQUIPMENT AND PERSONNEL DECONTAMINATION

During the initiation of the field investigative program, procedures will be implemented to reduce the amount of contact of both personnel and equipment with the waste constituents. These procedures include the following:

- i) proper work practices that would lead to minimal direct contact with potentially contaminated material; and
- ii) use of disposable equipment and clothing as much as practicable.

All equipment leaving the Exclusion Zone which came in contact with potentially contaminated material will be decontaminated.

Personnel decontamination, if required, will take place at the exit from the Exclusion Zone and will, as a minimum, consist of a glove wash with detergent and removal of gloves, disposable suit, and hard hat.

All personnel will remove their protective clothing and wash their hands, face, neck area and other exposed areas before entering the lunch and break areas to eat, drink or smoke.

Used PPE will be placed in plastic bags and then stored in 55-gallon drums. PPE will be segregated from general refuse and disposed of in accordance with federal, state and local requirements.

## I.17.0 CONTAMINATION MIGRATION CONTROL

All vehicles and equipment used within the Exclusion Zone will be decontaminated on Site as determined necessary by the HSO prior to leaving the Site. Decontamination, when required, will consist of the thorough cleaning of those parts of the equipment which come in contact with potentially contaminated material. The HSO will certify that each piece of equipment is clean or has been decontaminated prior to removal from the Site.

Personnel engaged in vehicle decontamination will wear protective equipment including suitable disposable clothing, respiratory protection and face shields.